

Thomas A. Egan, Esq.
FLEMMING ZULACK WILLIAMSON ZAUDERER LLP
One Liberty Plaza
New York, New York 10006
(212) 412-9500
tegan@fzwz.com

Attorneys for Plaintiff 7 World Trade Company, L.P. and
for the WTCP Plaintiffs:

World Trade Center Properties LLC
1 World Trade Center LLC
2 World Trade Center LLC
3 World Trade Center LLC
4 World Trade Center LLC

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
IN RE SEPTEMBER 11 LITIGATION

:
: 21 MC 101 (AKH)
:

-----X
WORLD TRADE CENTER PROPERTIES LLC,
et al.,

Plaintiffs,

v.

UNITED AIRLINES, INC., et al.,

Defendants.

:
: 08 CIV. 3719 (AKH)
:

: **NOTICE OF EMERGENCY**
: **MOTION FOR RELIEF FROM**
: **ORDER**
:

-----X
WORLD TRADE CENTER PROPERTIES LLC
et al.,

Plaintiffs,

v.

AMERICAN AIRLINES, INC., et al.,

Defendants.

:
: 08 CIV. 3722 (AKH)
:

-----X
PLEASE TAKE NOTICE that, upon the accompanying Declaration of Thomas A. Egan,
Esq. (the "Egan Decl."), and the exhibits thereto, plaintiffs World Trade Center Properties LLC,

1 World Trade Center LLC, 2 World Trade Center LLC, 3 World Trade Center LLC (formerly known as 5 World Trade Center LLC), and 4 World Trade Center LLC (collectively, the “WTCP Plaintiffs”) and 7 World Trade Company, L.P. (“7 WTC”), by their attorneys, Flemming Zulack Williamson Zauderer LLP, move this Court for an Order relieving them of the obligation imposed by this Court’s Order Denying Uninsured Loss Plaintiffs’ Motion for Early Disbursement of Settlement Funds (dated September 21, 2010 and filed September 22, 2010, the “Order”) requiring the WTCP Plaintiffs and 7 WTC to “enter into a binding accelerated briefing schedule in the Second Circuit” relating to 21 appeals now pending there arising from Rule 54(b) Judgments entered in cases in the 21 MC 101 docket and mandating that that accelerated briefing schedule “require [the WTCP Plaintiffs and 7 WTC] to perfect their appeal and file an opening brief by the end of October.”

PLEASE TAKE FURTHER NOTICE that the WTCP Plaintiffs and 7 WTC also move this Court for an Order permitting them to request that the Second Circuit allow the perfection of the WTCP Plaintiffs’ and 7 WTC’s appeals and the filing of the WTCP Plaintiffs’ and 7 WTC’s opening brief by not later than three weeks from the date of the Second Circuit’s determination of the Aviation Defendants/Appellees’ motion currently pending before the Second Circuit to dismiss two of the 21 appeals at issue.

PLEASE TAKE FURTHER NOTICE that, given that, pursuant to the Order, the WTCP Plaintiffs and 7 WTC entered into and filed a stipulation requiring them to perfect their appeals and file their opening briefs by October 29, 2010 (a date only eight days from the initiation of this motion) and given that, as set forth more fully in the Egan Decl., the current procedural posture of these appeals in the Second Circuit renders it impossible for the WTCP Plaintiffs and

7 WTC to comply with that date, the WTCP Plaintiffs respectfully request that this Court determine this motion in a very expedited manner.

Dated: October 21, 2010
New York, New York

FLEMMING ZULACK WILLIAMSON ZAUDERER LLP

By: Thomas A. Egan
Thomas A. Egan, Esq.
One Liberty Plaza
New York, New York 10006
(212) 412-9500
tegan@fzwz.com

Attorneys for Plaintiff 7 World Trade Company, L.P. and
for the WTCP Plaintiffs:

World Trade Center Properties LLC
1 World Trade Center LLC
2 World Trade Center LLC
3 World Trade Center LLC
4 World Trade Center LLC

362059